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Attorneys for United States of America

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

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UNITED STATES OF AMERICA,

Plaintiff,

vs.

SHA-RON HAINES,

Defendant.

Case No.: 2:16-cr-00137-JAD-GWF

**STIPULATION AND PROPOSED**  
**ORDER TO CONTINUE**  
**CHANGE OF PLEA HEARING**  
(First Request)

It is hereby stipulated and agreed, by and between Steven W. Myhre, Acting United States Attorney, through Richard Anthony Lopez, Assistant United States Attorney, and Andrea Luem, counsel for Defendant Sha-ron Haines, that the change of plea hearing currently scheduled for May 16, 2017, at 1:30 p.m. (ECF 37) be continued to a later time convenient for the Court but no earlier than May 24, 2017.

This stipulation is entered into for the following reasons:

1. On March 29, 2017, the Defendant filed a notice of intent to plead guilty without a plea agreement through his defense counsel at the time, Karen Connolly. (ECF 30.)

2. On April 20, 2017, Ms. Connolly filed a motion to withdraw as the Defendant's attorney (ECF 34), which this Court granted on April 24, 2017 (ECF 37). That same day, the Court

1 appointed Andrea Luem as counsel for the Defendant (ECF 39) and rescheduled the change of  
2 plea hearing for May 16, 2017, at 1:30 p.m. (ECF 37) so that the Defendant could confer with new  
3 counsel about whether to proceed with changing his plea.

4 3. The Defendant is still considering whether or not to change his plea.

5 4. Counsel for the Government now has a trial scheduled for the week of May 15,  
6 2017, that is likely to go forward and is expected to require at least four days.

7 5. Counsel for the Defendant is not available May 22 or 23, 2017.

8 6. The parties request that the Court continue the change of plea hearing to a time  
9 convenient for the Court but no earlier than May 24, 2017.

10 7. The Defendant is currently in federal custody and does not object to a continuance.

11 8. As trial in this case is currently scheduled for August 8, 2017, the parties do not  
12 believe that the requested continuance will affect the date of trial.

13 9. The additional time requested is not sought for purposes of delay, but to  
14 accommodate the schedule of counsel for the parties.

15 10. This is the first request for a continuance of the hearing set for a change of plea.

16 Dated this the 9th day of May, 2017.

17 Respectfully Submitted,

18 STEVEN W. MYHRE  
Acting United States Attorney

19 By: /s/ Andrea Luem  
20 ANDREA LUEM  
Counsel for Defendant Sha-ron Haines

By: /s/ Richard Anthony Lopez  
RICHARD ANTHONY LOPEZ  
Assistant United States Attorney

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Defendant.

Case No.: 2:16-cr-00137-JAD-GWF

HONORABLE JENNIFER A. DORSEY  
UNITED STATES DISTRICT JUDGE

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Dated: May 9, 2017

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